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MEMO ENDORSED

VIA ECF

Hon. Sidney H. Stein
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: United States v. Jennifer Shah
S5 19 Cr. 833 (SHS)

Dear Judge Stein:

Charles Clayman and I represent Jason Sager. Mr. Sager is a defendant in United States v. Sager, S11 17 Cr. 243 (SHS), which is pending before this Court. On February 11, 2022, Mr. Clayman and I were served with a Rule 17(c) Subpoena by counsel for Jennifer Shah, the defendant in United States v. Shah, S5 19 Cr. 833 (SHS), which is also pending before this Court. The Subpoena calls for the production of documents on or before February 22, 2022.

Several other law firms received identical Rule 17 subpoenas from Ms. Shah's counsel, including Perry Guha LLP, counsel for one of Ms. Shah's co-defendants. It is our understanding that these subpoenas contain identical document requests. Today Perry Guha LLP moved to quash the subpoena issued to them (Docket Entry #469) and informed the Court in their papers that we join in their motion.

We write to advise the Court that we join in Perry Guha LLP's motion to quash. For the reasons set forth in Perry Guha LLP's motion, the Rule 17(c) Subpoena pertaining to Mr. Sager should also be quashed.

We thank the Court for its consideration of this issue.

Respectfully submitted,

/s/

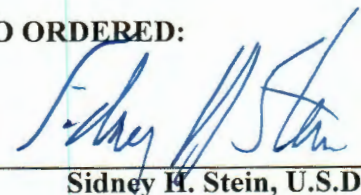
Thomas C. Rotko

The request to join in the motion to quash is granted.

cc: Counsel via ECF

**Dated: New York, New York
February 23, 2022**

SO ORDERED:



Sidney H. Stein, U.S.D.J.